

LAW OFFICES OF DALE K. GALIPO

Dale K. Galipo (SBN 144074)
dalekgalipo@yahoo.com
Renee V. Masongsong (SBN 281819)
rvalentine@galipolaw.com
21800 Burbank Blvd., Ste. 310
Woodland Hills, CA 91367
Tel: (818) 347-3333
Fax: (818) 347-4118

RODNEY S. DIGGS, Esq. (SBN 274459)
Email: RDiggs@imwlaw.com
IVIE MCNEILL WYATT PURCELL & DIGGS
444 South Flower Street, Suite 3200
Los Angeles, California 90071
Tel: (213) 489-0028
Fax: (213) 489-0552

Attorneys for Plaintiff, STEFFON BARBER

Eugene P. Ramirez (State Bar No. 134865)
eugene.ramirez@manningkass.com
Kayleigh Andersen (State Bar No. 306442)
kayleigh.andersen@manningkass.com

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**
801 S. Figueroa St, 15th Floor
Los Angeles, California 90017-3012
Telephone: (213) 624-6900
Facsimile: (213) 624-6999

Attorneys for Defendants, COUNTY OF SAN BERNARDINO and DEPUTY
CHRISTOPHER ALFRED

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

STEFFON BARBER, an individual,

Plaintiff,

vs.

COUNTY OF SAN BERNARDINO and
CHRISTOPHER ALFRED,

Defendants.

Case No. 5:22-cv-00625-KK-DTB

Assigned to:
District Judge Kenly Kiya Kato
Magistrate Judge David T. Bristow

JOINT PROPOSED WITNESS LIST

Final PTC: January 8, 2026
Time: 10:30 a.m.
Crtrm: 3, 3rd Floor
3470 Twelfth Street
Riverside, CA 92501-3801

TO THE HONORABLE COURT:

Pursuant to Local Rule 16-5 and this Court's Civil Trial Scheduling Order (Dkt. 47), Plaintiff Steffon Barber and Defendants, County of San Bernardino and Christopher Alfred, through their counsel of record, hereby submit this Joint Proposed Witness List for the January 26, 2026 trial.

<u>Witness Name</u>	<u>Party Calling</u>	<u>Time Direct Exam</u>	<u>Time Cross Exam</u>	<u>Description of Testimony</u>
Christopher Alfred (Common pronunciation)	P/D	2 hours (P) /3 hours (D)		Involvement in the subject incident and use of deadly force against Steffon Barber; background and experience; training with respect to the use of deadly force; facts and circumstances known to him surrounding the incident. (Liability)
Steffon Barber (Stef-on Barber)	P	0.5 – 0.75 hours	2 hours	Recollection of the subject incident; damages. (Liability and Damages)
Detective Edward Hernandez (Edward Her-nan-dez)	P/D	1 hour (P) /1 hour (D)		Det. Hernandez is a Detective with the San Bernardino County Sheriff's Department. He will testify as to facts regarding the investigation of the incident. (Liability)

1	Scott A. DeFoe	P	1.5 hours	1 hour	Mr. DeFoe is
2	(Scott De-Foe)				Plaintiff's retained
3					police practices
4					expert. He will testify
5					to: his background
6					and experience;
7					police training and
8					POST standards,
9					including with
10					respect to the use of
11					deadly force and
12					shooting at vehicles
13					and their drivers;
14					opinions regarding
15					Defendant Alfred's
16					conduct, tactics, and
17					use of force during
18					the subject incident;
19					all other opinions
20					made in his Rule 26
21					report and at the time
22					of his deposition.
23					(Liability)
24	Dr. Amy Magnusson	P	1 hour	1 hour	Dr. Magnusson is
25	(Amy Mag-nuss-on)				Plaintiff's retained
26					medical expert. She
27					will testify as to:
28					Plaintiff's injuries,
					treatment, damages,
					pain and suffering;
					Plaintiff's current
					medical condition;
					the anticipated future
					prognosis, surgeries,
					and medical care
					Plaintiff will require;
					all other opinions
					made in his Rule 26
					report and at the time
					of her deposition.

				(Liability and damages)
Dr. Bennet Omalu (Ben-net Oh-mall-oo)	P	1 – 1.5 hours	1 hour	Dr. Omalu is Plaintiff's retained neuropathology expert. He will testify as to: the trajectory of the gunshot wound suffered by Plaintiff; the traumatic brain injury Plaintiff suffered as a result of the shooting; Plaintiff's pain and suffering; the likely long-term effects of Plaintiff's traumatic brain injury; all other opinions made in his Rule 26 report and at the time of his deposition. (Liability and damages)
Robert Morales (Robert Mor-al-es)	P	1 – 1.5 hours	1 hour	Mr. Morales is Plaintiff's retained accident reconstruction expert. He will testify as to: his forensic analysis of the incident, including but not limited to the reconstruction of the chronological sequence of events, the total distance, time and maximum speed traveled by Plaintiff's vehicle during the incident,

				the distance between Plaintiff's vehicle and Defendant Alfred before the first shot was fired and immediately after the last shot was fired, analysis of the scene; all other opinions made in his Rule 26 report and at the time of his deposition. (Liability)
Ryan Murphy (Common pronunciation)	P/D	0.5 hours/0.75 hours (D)		Mr. Murphy is a firefighter/paramedic with the San Bernardino County Fire Department. Mr. Murphy will testify as to his observations of Plaintiff's injuries after the shooting, any medical treatment provided, and the reasonableness and necessity of such medical treatment. (Liability and Damages)
Ryan Gilford (Common pronunciation)	P/D	0.5 hours/0.75 hours (D)		Mr. Gilford is a firefighter/paramedic with the San Bernardino County Fire Department. Mr. Gilford will testify as to his observations of Plaintiff's injuries after the shooting, any medical treatment provided,

				and the reasonableness and necessity of such medical treatment. (Liability and Damages)
Daniel Tellez (Common pronunciation)	P/D	0.5 hours/0.75 hours (D)		Mr. Tellez is a Fire Captain with the San Bernardino County Fire Department. Mr. Tellez will testify as to his observations of Plaintiff's injuries after the shooting, any medical treatment provided, and the reasonableness and necessity of such medical treatment. (Liability and Damages)
Marissa Pasillas (Ma-riss-a Pa-see-us)	P	0.5 hours	0.5 hours	Ms. Pasillas is a helo-paramedic. She will testify as to her examination of Plaintiff, Plaintiff's injuries, and the emergency medical care provided to Plaintiff. (Liability and Damages)
Marshal Cowley (Mar-shull Cow-lee)	P	0.5 hours	0.5 hours	Mr. Cowley is a helo-RN. His examination of Plaintiff, Plaintiff's injuries and the emergency medical care provided to Plaintiff.

				(Liability and Damages)
Dr. Ho-Wang Yuen (Ho-Wang You-en)	P	0.5 hours	0.5 hours	Dr. Yuen was the attending emergency physician who treated Plaintiff at Arrowhead Regional Medical Center (ARMC). Dr. Yuen will testify as to his examination of Plaintiff, Plaintiff's injuries, the medical treatment rendered to Plaintiff at ARMC and the reasonableness and necessity of such medical treatment. (Liability and Damages)
Dr. Brandon Woodward (Common pronunciation)	P	0.5 hours	0.5 hours	Dr. Woodward was the attending surgeon who treated Plaintiff at ARMC. Dr. Woodward will testify as to his examination of Plaintiff, Plaintiff's injuries, the medical treatment rendered to Plaintiff at ARMC and the reasonableness and necessity of such medical treatment. (Liability and Damages)
Dr. Javed Siddiqi (Ja-ved Sa-di-qi)	P	0.5 hours	0.5 hours	Dr. Siddiqi was a consulting neurosurgeon who

				evaluated Plaintiff at ARMC. Dr. Siddiqi will testify as to his examination of Plaintiff, Plaintiff's injuries, the medical treatment rendered to Plaintiff at ARMC and the reasonableness and necessity of such medical treatment. (Liability and Damages)
Dr. Ha Le* (Hah Leh)	P	0.5 hours	0.5 hours	Dr. Ha Le was a consulting physician specializing in Radiology who evaluated Plaintiff at ARMC. Dr. Ha Le will testify as to his examination of Plaintiff, Plaintiff's injuries, the medical treatment rendered to Plaintiff at ARMC and the reasonableness and necessity of such medical treatment. (Liability and Damages)
Dr. Carolyn Leach* (Care-oh-lin Leech)	P	0.5 hours	0.5 hours	Dr. Leech was a consulting physician specializing in Pathology who evaluated Plaintiff at ARMC. Dr. Leach will testify as to her examination of Plaintiff, Plaintiff's

				injuries, the medical treatment rendered to Plaintiff at ARMC and the reasonableness and necessity of such medical treatment. (Liability and Damages)
Dr. Debra Craig* (Common Pronunciation)	P	0.5 hours	0.5 hours	Dr. Craig was a consulting physician specializing in Internal Medicine who evaluated Plaintiff at ARMC. Dr. Craig will testify as to her examination of Plaintiff, Plaintiff's injuries, the medical treatment rendered to Plaintiff at ARMC and the reasonableness and necessity of such medical treatment. (Liability and Damages)
Dr. Michael Schiraldi* (Michael Shi-rah-di)	P	0.5 hours	0.5 hours	Dr. Schiraldi was a consulting physician specializing in General Surgery who evaluated Plaintiff at ARMC. Dr. Schiraldi will testify as to his examination of Plaintiff, Plaintiff's injuries, the medical treatment rendered to Plaintiff at ARMC and the reasonableness and

				necessity of such medical treatment. (Liability and Damages)
Dr. Jason Duong (Jay-son Yung or Dzung – <i>regional difference between Northern and Southern Vietnam</i>)	P	0.5 hours	0.5 hours	Dr. Duong was a consulting physician specializing in General Surgery who evaluated Plaintiff at ARMC. Dr. Duong will testify as to his examination of Plaintiff, Plaintiff's injuries, the medical treatment rendered to Plaintiff at ARMC and the reasonableness and necessity of such medical treatment. (Liability and Damages)
Dr. Daniel Miulli (Daniel Myoo-li)	P	0.5 hours	0.5 hours	Dr. Miulli was a consulting physician specializing in Neurosurgery who evaluated Plaintiff at ARMC. Dr. Miulli will testify as to his examination of Plaintiff, Plaintiff's injuries, the medical treatment rendered to Plaintiff at ARMC and the reasonableness and necessity of such medical treatment. (Liability and Damages)

1	Maria Gallo (Maria Gah-yo)	D	0.5	0.5 hours	Ms. Gallo is the Reporting Party from the Incident with Plaintiff. She will testify about her interactions with Plaintiff before the Incident, including on the date of the Incident. (Liability and Damages)
2					
3					
4					
5					
6					
7					
8	Joseph Cocchi (Joseph Koh-kee)	D	0.5	0.5 hours	Mr. Cocchi is the Reporting Party from the Incident with Plaintiff. He will testify about his interactions with Plaintiff before the Incident, including on the date of the Incident. (Liability and Damages)
9					
10					
11					
12					
13					
14					
15					
16	Deputy Larry Torres (Larry Tor-ez)	D	0.75	0.5 hours	Deputy Torres is a Deputy with the San Bernardino County Sheriff's Department. He will testify as to facts regarding the incident, his response to the Incident. (Liability)
17					
18					
19					
20					
21					
22	Deputy Joseph Mora (Joseph More-ah)	D	0.75	0.5 hours	Deputy Mora is a Deputy with the San Bernardino County Sheriff's Department. He will testify as to facts regarding the incident, his response to the Incident. (Liability)
23					
24					
25					
26					
27					
28					

1 Deputy Rick Morales (Rick Mor-al-es)	D	0.75	0.5 hours	Deputy Morales is a Deputy with the San Bernardino County Sheriff's Department. He will testify as to facts regarding the incident, his response to the Incident. (Liability)
7 Sgt. Taylor Long* (Common pronunciation)	D	0.5	0.5 hours	Sgt. Long is a Sergeant with the San Bernardino County Sheriff's Department. He will testify as to facts regarding the incident, his response to the Incident. (Liability)
13 Detective Robert Ripley* (Robert Rip-lee)	D	0.5	0.5 hours	Det. Ripley is a Detective with the San Bernardino County Sheriff's Department. He will testify as to facts regarding the investigation of the incident. (Liability)
19 Detective Gerania Navarro* (Juh-rah-nee-ah Nah-vah-rroh)	D	0.5	0.5 hours	Det. Navarro is a Detective with the San Bernardino County Sheriff's Department. She will testify as to facts regarding the investigation of the incident. (Liability)
25 Crime Scene Specialist Kim Shapiro* (Kim Shah-pie-roh)	D	0.5	0.5 hours	CSI Shapiro is a crime scene specialist with the San Bernardino County Sheriff's Department.

				She will testify as to facts regarding the investigation of the incident, including but not limited to collection of evidence. (Liability)
Crime Scene Specialist Andrew Guerrero* (Andrew Geh-rreh-oh)	D	0.5	0.5 hours	CSI Guerrero is a crime scene specialist with the San Bernardino County Sheriff's Department. He will testify as to facts regarding the investigation of the incident, including but not limited to collection of evidence. (Liability)
Crime Scene Specialist Paige Green-Purba* (Paige Green-Poor-bah)	D	0.5	0.5 hours	CSI Green-Purba is a crime scene specialist with the San Bernardino County Sheriff's Department. She will testify as to facts regarding the investigation of the incident, including but not limited to collection of evidence. (Liability)
Criminalist II Ricky Delgado* (Ricky Dehl-gah-doh)	D	0.5	0.5 hours	Criminalist Delgado is a criminalist with the San Bernardino County Sheriff's Department. He will testify as to facts regarding the investigation of the incident, including but not limited to

				collection and testing of evidence. (Liability)
Criminalist II Randall Rees* (Randall Reese)	D	0.5	0.5 hours	Criminalist Rees is a criminalist with the San Bernardino County Sheriff's Department. He will testify as to facts regarding the investigation of the incident, including but not limited to collection and testing of evidence. (Liability)
Ola Bawardi* (Oh-lah Bah-war-dee)	D	0.5	0.5 hours	Bawardi is with Bio-Tox Laboratories. She will testify as to the results of laboratory testing for alcohol and substances found in Plaintiff's system after Incident. (Liability and damages)
Kirsten Steward* (Common pronunciation)	D	0.5	0.5 hours	Steward is with Bio-Tox Laboratories. She will testify as to the results of laboratory testing for alcohol and substances found in Plaintiff's system after Incident. (Liability and damages)
Erin Crabtrey* (Erin Crab-tree)	D	0.5	0.5 hours	Crabtrey is with Bio-Tox Laboratories. She will testify as to

				the results of laboratory testing for alcohol and substances found in Plaintiff's system after Incident. (Liability and damages)
Phillip Sanchez (Phillip San-chez)	D	2 hours	1 – 1.5 hours	Mr. Sanchez is Defendants' retained police practices expert. He will testify as to the use of force, policy, procedure, and training as it relates to Plaintiff's claims arising from the Incident; all other opinions made in his Rule 26 report and at the time of his deposition. (Liability)
Dr. Gary M. Vilke (Gary Vill-keh)	D	2 hours	0.75 – 1.0 hours	Dr. Vilke is Defendants' retained medical expert. He will testify as to the extent of Plaintiff's injuries, Plaintiff's medical history, Plaintiff's prognosis and treatment for his injuries as it relates to Plaintiff's claims arising from the Incident; all other opinions made in his Rule 26 report. (Damages)

* Indicates this witness may be called only if the need arises.

Dated: December 18, 2025

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP

By: s/ Kayleigh A. Andersen

Eugene P. Ramirez
Kayleigh A. Andersen
Attorneys for Defendants, County of
San Bernardino and

Dated: December 18, 2025

IVIE MCNEILL WYATT
PURCELL & DIGGS

By: s/ Rodney S. Diggs

Rodney S. Diggs
Attorney for Plaintiff, Steffon Barber

Dated: December 18, 2025

LAW OFFICES OF DALE K. GALIPO

By: s/ Renee V. Masongsong

Dale K. Galipo
Renee V. Masongsong
Attorneys for Plaintiff, Steffon Barber